

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

99.6017

MARY E. BROWN,

Plaintiff,

VS

HOLIDAY AL MANAGEMENT SUB LLC,

Defendants.

NO.

Jury Demand

NOTICE OF REMOVAL BY DEFENDANT HOLIDAY AL MANAGEMENT SUB, LLC

Defendant, Holiday AL Management Sub, LLC, (“Holiday”) files this Notice of Removal in the above-referenced Matter. This case stems from a slip-and-fall in Clarksville, Montgomery County, Tennessee.

Holiday would show to the Court that complete diversity of citizenship exists between the parties. Holiday is a limited liability corporation, formed under Delaware law, with a principal place of business in Winter Park, Florida. Plaintiff resides in Clarksville, Tennessee.

The amount in controversy exceeds \$75,000, exclusive of interest and costs.

Holiday is the only named Defendant, properly served with a summons and a copy of the Complaint. Therefore, removal is proper from the Montgomery County Circuit Court to the United States District Court for the Middle District of Tennessee, Nashville Division.

Attached and marked as Exhibits “A” are copies of the Pleadings that have been filed in the Montgomery County Circuit Court. Defendant also attached its own “Filing Information,”

available through the Tennessee Secretary of State's website. The "Filing Information" is attached hereto as Exhibit "B."

Respectfully submitted,

**McNABB, BRAGORGOS, BURGESS &
SORIN, PLLC**

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CERTIFICATE OF SERVICE

This certifies that on November 27, 2018 a true and correct copy of the foregoing document has been served upon opposing counsel for all parties or all parties individually by electronic means through the Court's Electronic Filing System and/or via first-class U.S. Mail, postage prepaid, as follows:

R. Douglas Hanson, Esq.
Hughes & Coleman
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Nashville, TN 37219

/S/ RICHARD SORIN